

Worksheet
Documentation of Land Use Plan Conformance and Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Utah Bureau of Land Management (BLM)

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

A. BLM Office: Price Field Office (UT-070)

Proposed Action Title: February 20, 2007 Competitive Oil and Gas Lease Sale

Location of Proposed Action: Parcels within Carbon and Emery County, Utah. Attachment 2 contains legal descriptions for each parcel.

Description of the Proposed Action: The Utah State Office proposes to offer 6 parcels of land in Carbon and Emery Counties, Utah administered by the Price Field Office for oil and gas leasing in a competitive lease sale to be held on February 20, 2007. All 6 parcels were assessed for land use plan compliance and NEPA adequacy. Five (5) parcels are located in Carbon County, Utah and one (1) parcel is located in Emery County, Utah. Attachment 2 lists all parcels including special lease stipulations and lease notices. These parcels include public lands or lands in which the mineral estate is administered by the BLM. If a parcel of land is not purchased at the lease sale by competitive bidding, it may still be leased within two years after the initial offering under a current review of NEPA adequacy. A lease may be held for ten years, after which the lease expires unless oil or gas is produced in paying quantities. A producing lease can be held indefinitely by economic production.

Planning decisions place certain lands in a no leasing category. Most lands are leased with minor stipulations attached to the lease from the appropriate land use plan for the area. Some lands are leased with limited areas of no surface occupancy within the lease boundaries. Some lands are leased with no stipulations other than those found on the standard lease contract form. A lease grants the right to drill for oil and gas, at some location on the lease.

A lessee must submit an Application for Permit to Drill (APD) (Form 3160-3) to the BLM for approval and must possess an approved APD prior to any surface disturbance in preparation for drilling. Any stipulations attached to the standard lease form must be complied before an APD may be approved. Following BLM approval of an APD, a lessee may produce oil and gas from the well in a manner approved by BLM in the APD or in subsequent sundry notices. The operator must notify the appropriate authorized officer, 48 hours before starting any surface disturbing activity approved in the APD.

This leasing analysis includes Three (3) parcels that would lease only the gas generated as a result of coal mining activities. Mining generated gas in commercial quantities is found where the coal seam(s) have been extracted and the area above the coal is allowed to cave. In full extraction mining, the strata above the coal seam(s) containing the natural gas break and release the gas into this caving zone. This zone, known as the gob, is created generally as a longwall face is retreating. The gob gas can be vented through bore holes drilled into the collapsed zone behind the longwall operation. The venting of the gas into the atmosphere reduces the risk of an explosion while the mine is in operation. Leasing this gas would allow the lessee to capture this gas into a pipeline system and sell it on the market. No drilling by the lessee would occur as the bore holes that would be used to extract the

gas are already open. Only pipelines and other infrastructure needed to transport the gas to market would be constructed.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

- Price River Management Framework Plan, September 2, 1983
- Price River Management Framework Plan Supplement, August 13, 1984
- San Rafael Resource Management Plan, May 24, 1991
- Range Valley Habitat Management Plan, 1991

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

Price River Management Framework Plan (MFP) Minerals M-1: Allow and encourage development of those Leasable minerals known to occur within the planning area in accordance with current laws and regulations so as to aid in filling the local and national energy requirements.

San Rafael Resource Management Plan (RMP) (page 11): To lease public lands for oil and gas...only so long as RMP goals are met; and to administer operational aspects of federal oil and gas leases where BLM does not manage the surface.

The Oil and Gas Category plats of the Price River MFP and the San Rafael RMP identify the stipulations to be attached to each lease or portion thereof.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

- Price District Oil and Gas Environmental Analysis Record, August 15, 1975
- Price River Management Framework Plan Supplement, August 13, 1984
- EA Supplement on Cumulative Impacts on Oil and Gas Lease Categories, Price River Resource Area, December 23, 1988
- San Rafael Resource Management Plan Final Environmental Impact Statement, May 24, 1991
- San Rafael Proposed Resource Management Plan, 1989 Vol. 1 and 2]
- Castlegate Coalbed Methane Project Carbon County Utah, October 1992
- Price Coalbed Methane Project Final Environmental Impact Statement, May 1997
- Ferron Natural Gas Project Final Environmental Impact Statement, July 6, 1999
- Mineral Potential Report, Price Field Office, RMP EIS, May 2002
- Price Field Office Resource Management Plan Draft Environmental Impact Statement (EIS), July 2004 (referred to in this document as the 2004 draft RMP EIS)
- Price RMP ACEC Proposal Review Information 2003-2004

D. NEPA Adequacy Criteria

1. **Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?**

Item 1: Yes for the following parcels:

UT0207-122

UT0207-123
UT0207-124
UT0207-125
UT0207-126
UT0207-128

Item 1: Rationale for Yes: The Price District Oil and Gas Environmental Analysis Record, the 1988 Environmental Assessment (EA) Supplement on Cumulative Impacts on Oil and Gas Leasing Categories for Price River Resource Area analyzed the leasing of parcels for development of mineral resources. The San Rafael Resource Management Plan Final Environmental Impact Statement (EIS) proposed leasing for oil and gas development stating, "To lease public lands for oil and gas... only so long as RMP goals are met; and to administer operational aspects of federal oil and gas leases where BLM does not manage the surface."

Item 1: No for the following parcels: None

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Item 2: Yes for the following parcels:

UT0207-122
UT0207-123
UT0207-124
UT0207-125
UT0207-126
UT0207-128

Item 2: Rationale for Yes: The range of alternatives in the Price District Oil and Gas Environmental Analysis Record, 1984 Price River Resource Area Management Framework Plan Supplement, the EA Supplement on Cumulative Impacts on Oil and Gas Lease Categories, Price River Resource Area, December 23, 1988, and the San Rafael RMP EIS are appropriate. In the 1975 District Oil and gas EA, BLM evaluated leasing and one alternative, to not allow leasing. The Decision Record of the 1984 Price River Resource Area Management Framework Plan Supplement states that alternatives were considered throughout the document including no action, open to leasing, leasing with special stipulations, no surface occupancy and no leasing. The San Rafael EIS analyzed the impacts of oil and gas leasing on all the lands in the San Rafael Resource Area under seven alternatives which ranged from maximum oil and gas development to reduced production in favor of other resource values.

Item 2: No for the following parcels: None

3. Is existing analysis adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent U.S. Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Item 3: Yes for the following parcels:

(indicates that a portion of this parcel is deferred)*

UT0207-122*

UT0207-123

UT0207-124

UT0207-125

UT0207-126

Item 3: Rationale for "Yes": The Price District Oil and Gas Environmental Analysis Record, the EA Supplement on Cumulative Impacts on Oil and Gas Lease Categories, Price River Resource Area, December 23, 1988, and the San Rafael RMP Final EIS describe the resource values that could be affected by the proposed leasing. Since the publication of these NEPA documents, environmental justice, ground water quality, Native American Religious Concerns, and noxious weeds have been added to the list of critical elements of the human environment.

Environmental Justice: The ethnic composition and economic situation of residents of Carbon and Emery Counties indicate that no minority or low-income populations are experiencing disproportionately high or adverse effects from current management actions (2004 Draft RMP EIS, pg 3-62). Leasing would not adversely or disproportionately affect minority, low income or disadvantaged groups.

Groundwater: Groundwater quality for the land proposed for lease was analyzed in the original planning documents. Usable water zones would be isolated and protected under current regulations and Onshore Orders when permits are submitted and considered for approval.

Invasive, Non-native Species: Noxious weed introduction is limited by standard operating procedures and best management practices used as conditions of approval for surface use authorizations. These practices include, equipment washing, inspections and treatments to limit the spread or introduction of invasive, not-native species.

Native American Religious Concerns: On November 13, 2006 certified consultation letters (attached to the cultural staff report in Attachment 4) were sent to the following Tribes: Southern Ute, Navajo, Shoshone-Wyoming, Hopi, Goshute, Zuni, Uintah and Ouray Ute, Ute Mountain Ute, Northwestern Band of the Shoshone, Shoshone-Bannock, and Paiute. The letters requested comments to be provided to the PFO within 30 days upon receipt of the letter. The last return receipt received was dated November 17, 2006. As of December 15, 2006, no responses have been received. If any concerns are raised by the tribes, those concerns will be addressed. Consultation will be considered complete if tribal response presents no objections or if response is not received within 30 business days after the last letter was received.

Cultural Resources: The area of potential effect as defined for the February 2007 Oil and Gas Lease Sale is identified by the legal descriptions provided in Attachment 2 for each lease parcel. All parcels within this lease sale were reviewed for the presence of cultural resources.

The information on previous archaeological inventories and recorded sites comes from the archaeological site files located at the BLM Field Office in Price, Utah. Many of the previous inventories are over twenty years old and were made at a different standard than today. Additional sites are expected to exist that have not been recorded. The existing inventories and others surrounding these parcels are sufficient to determine that historic properties are likely to be present on each proposed lease parcel.

This evaluation is based on the assumption, supported by topography, perceived site density, existing access possibilities and previous inventories in the areas of the parcels, there should be a place on each lease parcel that one five acre well pad could be developed without directly affecting a significant cultural resource. Also it is the policy of this office that with the addition of the stipulation required by WO IM 2005-003, the BLM can avoid all impacts to cultural resources

It is submitted that this oil and gas lease undertaking falls under the purview of the Protocol negotiated between BLM and the Utah State Historic Preservation Office, a document designed to assist BLM in meeting its responsibilities under the National Historic Preservation Act, various implementing regulations, and the National Cultural Programmatic Agreement. Further, the view taken here is that the undertaking does not exceed any of the review thresholds listed in Part VII (A) of the Protocol, and that it may be viewed as a No Historic Properties Affected; eligible sites present, but not affected as defined by 36CFR800.4 [VII (A) C (4)]. This undertaking was documented in the Protocol log and sent to the SHPO in December 2006.

To assure appropriate consideration of future effects from the February 20, 2006 lease sale, the BLM will add the following "lease stipulation" (WO-IM-2005-003), to all parcels offered for lease.

"This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration, or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated." (WO-IM 2005-03).

Special Status Species: Habitat evaluations were conducted for special status species. Only one parcel, UT0207-128, was identified as containing potential habitat for Bald Eagle, Bonytail Chub, Colorado Pikeminnow, Humpback Chub, and Razorback Sucker. The wildlife report is contained in Attachment 4. Parcel UT0207-128 is deferred and will not be offered in the February 20, 2007 lease sale.

Greater sage-grouse nesting grounds, a sensitive animal species occur within all parcels offered for lease sale. Application of lease stipulations, notices, best management practices, and approval conditions would afford protection for these species for any surface use activities. Additionally, a stipulation for protection of special status species is added to all parcels.

Eligible Wild and Scenic Rivers: Parcel UT0207-122 is bisected by Fish Creek, which is eligible for wild and scenic status. To preserve the values that make this river eligible for wild and scenic status, the stream corridor (defined as the area within one quarter mile from the high water mark on each river bank) was deferred from this parcel. The portion of this parcel located outside the wild and scenic river corridor was analyzed for NEPA adequacy and plan conformance prior to being offered for lease sale. Parcel UT0207-128 is located along the Green River. This parcel was deferred because of wild and scenic eligibility and it is located within the proposed Lower Green River ACEC. Refer to Attachment 3 of the DNA for further discussion. The remaining parcels offered in this lease sale, are not located along eligible wild and scenic river corridors.

Wilderness Characteristics: No parcels known to have wilderness characteristics or identified as likely to have wilderness characteristics are offered in this lease sale.

Potential ACECs: The Price Field Office evaluated public nominations for areas of critical environmental concern (ACECs) as part of an ongoing planning effort. The Price Field Office determined that several areas do in fact have relevant and important values that make them potential ACECs for further consideration in the ongoing Price RMP revision. It is BLM policy to protect the relevant and important values of each potential ACEC until planning can be completed and the decision made as to whether or not to formally designate the areas as ACECs. No parcels recommended for lease sale are located within a potential ACEC. Parcel UT0207-128, is located within the potential Lower Green River ACEC and is deferred (refer to Attachment 3, deferred table rational for further discussion).

Paleontological Resources: Parcels UT0207-123, UT0207-124, UT0207-125, and UT0207-126 are located on geologic formations that are known to contain vertebrate fossils. Lease notices to protect paleontological resources during ground disturbing activities have been applied to these parcels. These lease notices notify the operator that paleontological surveys would be completed, as needed, prior to surface disturbing activities. The use of BMPs, SOPs and COAs would assure that paleontological resources are protected. These measures would include monitoring during initial construction when necessary.

Item 3: No for the following parcels:

(indicates that a portion of this parcel is recommended for lease)*

UT0207-122*

UT0207-128

Item 3: Rationale for "No": See Deferred Parcel Table in Attachment 3.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Item 4: Yes for the following parcels:

(indicates that a portion of this parcel is deferred)*

UT0207-122*

UT0207-123

UT0207-124

UT0207-125

UT0207-126

Item 4: Rationale for "Yes": The methodology and approach used in the Price District Oil and Gas Environmental Analysis Record, the 1984 and 1988 EA Supplements, the Utah Combined Hydrocarbon Leasing Regional EIS and the San Rafael RMP Final EIS are appropriate for the current proposed action because the methods of extraction, land requirements for exploration and development, and potential impacts have not changed substantially since completion of these documents. The basic analysis assumptions included in these documents are still applicable to the current proposal. Coalbed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface, therefore the methods of extraction, land requirements for exploration and development and potential impacts have not substantially changed.

Item 4: No for the following parcel:

(indicates that a portion of this parcel is recommended for lease)*

UT0207-122*

UT0207-128

Item 4: Rationale for "No": See Deferred Parcel Table in Attachment 3.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Do the existing NEPA documents analyze impacts related to the current proposed action at a level of specificity appropriate to the proposal (plan level, programmatic level, project level)?

Item 5: Yes for the following parcels:

(indicates that a portion of this parcel is deferred)*

UT0207-122*

UT0207-123

UT0207-124

UT0207-125

UT0207-126

Item 5: Rationale for "Yes": The Price District Oil and Gas Environmental Analysis Record, the 1984 and 1988 EA Supplements, the Utah Combined Hydrocarbon Leasing Regional EIS and San Rafael RMP Final EIS evaluated the direct and indirect impacts of oil and gas leasing per the current leasing categories, whether open to leasing, open to leasing with special stipulations or otherwise. As identified under criterion 3, no significant new information or circumstances have been identified which would render the existing analyses inadequate for leasing the above parcels. Nor have the existing resource conditions and other elements of the human environment changed substantially from those evaluated in the existing documents.

Coalbed methane production was not reasonably foreseeable when the planning documents were prepared. However, coalbed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface; therefore there is no change to the existing resource conditions and values.

Item 5: No for the following parcels:

(indicates that a portion of this parcel is recommended for lease)*

UT0207-122*

UT0207-128

Item 5: Rationale for "No": See Deferred Parcel Table in Attachment 3.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Item 6: Yes for the following parcels:

(indicates that a portion of this parcel is deferred)*

UT0207-122*

UT0207-123

UT0207-124

UT0207-125

UT0207-126

Item 6: Rationale for "Yes": The cumulative impacts of oil and gas including coalbed methane development have been analyzed in Castlegate Coalbed Methane Project, Price Coalbed Methane Project, and Ferron Natural Gas Project EISs. The EISs update the development scenario addressed the 1988 EA Supplements. The Ferron Natural Gas Project EIS, the last to be completed, addressed the cumulative impacts of all three actions. Therefore the cumulative impacts of coalbed methane and conventional oil and gas activities have been analyzed in full. Coalbed methane production was not reasonably foreseeable when the planning documents were prepared. However, coalbed methane production in Utah is essentially the same as conventional gas development as water production is injected below surface; therefore there is no change to the existing resource conditions and values.

Natural gas production from tar sands is essentially the same as conventional natural gas production. Because the areas have been analyzed for surface disturbance related to conventional natural gas and coalbed methane production, the cumulative impacts have been analyzed in full.

Western portions of Carbon County, including Nine Mile Canyon are not within the cumulative impacts analysis areas evaluated for the Castlegate Coalbed Methane Project, Price Coalbed Methane Project, or Ferron Natural Gas Project EISs. Therefore, these documents did not update the analysis included in the 1988 EA Supplement on Cumulative Impacts on Oil and Gas Categories.

The 1988 EA evaluated the cumulative impacts of oil and gas leasing to supplement the Price District Oil and Gas Environmental Analysis Record, August 15, 1975, and Price River Management Framework Plan Supplement, August 13, 1984. The 1988 EA supplement projected five wells drilled per year between 1988 and 2000 within the Price River Resource Area on lands administered according to the MFP. Estimates also projected that 48 of the 60 total wells would be non-producing, abandoned and reclaimed.

The 1984 Utah Combined Hydrocarbon Leasing Regional EIS of 1984 analyzed impacts of tar sands development on a regional basis and included in situ methods. This would involve more surface disturbance and infrastructure than conventional oil and gas methods.

The most recent cumulative impacts analysis, including the Stone Cabin 3D Seismic Survey Project EA completed March 19, 2004, projected at total of nine federal wells, plus five to seven wells to be drilled annually on state and private lands. The current implementation of the West Tavauputs Plateau Drilling Program, authorized July 29, 2004, consisting of development of 38 wells, exceeds this projection. Public comments on these documents were voluminous and provided by national interests. The comments largely identified transportation and public safety in Nine Mile Canyon, concerns related to the potential ACEC and potential National Historic District, opportunities for recreational viewing of rock art, and other potential impacts to cultural resources in Nine Mile Canyon as primary issues.

The current reasonably foreseeable development scenario in the Price RMP Draft EIS projects 600 wells on the West Tavauputs Plateau. The analysis contained in the Price RMP draft EIS would allow for multiple wells from each of these locations. The acres disturbed is in line with the expected cumulative impacts on the West Tavauputs Plateau. On August 27, 2005, the Price Field Office published in the Federal Register a Notice of Intent to prepare an EIS for full field development of natural gas resources on the West Tavauputs Plateau to include up to approximately 500 pad locations and 750 individual wells. The NOI for the full field development EIS also specified that development of future leases will be analyzed within the scope of that document.

Because the reasonably foreseeable level of oil and gas activity analyzed previously is still appropriate and additional connected, cumulative, or similar actions are not anticipated; potential cumulative impacts are substantially unchanged from those analyzed in the EISs and RFDs.

Item 6: No for the following parcels:

(indicates that a portion of this parcel is recommended for lease)*

UT0207-122*

UT0207-128

Item 6: Rationale for "No": See Deferred Parcel Table in Attachment 3.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Item 7: Yes for the following parcels:

UT0207-122

UT0207-123

UT0207-124

UT0207-125

UT0207-126

UT0207-128

Item 7: Rational for "Yes": The public involvement and interagency review procedures and findings made through the development of the Price River MFP, the Price River MFP Supplement approved August 13, 1984, and the Environmental Assessment Supplement on Cumulative Impacts on Oil and Gas Leasing Categories for the Price River Resource Area approved on December 23, 1988, the Environmental Assessment Supplement on Cumulative Impacts on Oil and Gas Leasing Categories for the San Rafael Resource Area approved on December 20, 1988, and the San Rafael Resource Management Plan approved May 24, 1991 are adequate for the proposed lease sale. A public meeting was held in Price on April 18, 1983. A Federal Register Notice concerning the preparation and availability was posted on April 1983. On June 13, 1985 a Federal Register Notice announced BLM's intention to develop the San Rafael RMP, soliciting public participation in the process. A series of opportunities, though comment periods, public workshops, and similar meetings, ensured an appropriate level of public participation during the preparation of the RMP EIS between 1985 and 1991.

In February 1997, BLM conducted public and internal scoping to solicit input to identify the environmental issues and concerns associated with the proposed Ferron Natural Gas Project. A Notice of Intent (NOI) to prepare an EIS was published in the Federal Register on January 28, 1997. An amendment to the NOI was published in the Federal Register on February 3, 1998, which adjusted the western boundary of the South Area to the location evaluated in this EIS. The BLM prepared a scoping information packet and provided copies of it to federal, state, and local agencies; Native American groups; and members of the general public. In addition, the BLM conducted public scoping meetings in Price, Utah; Castle Dale, Utah; and Salt Lake City, Utah on February 11, 12, and 13, 1997, respectively. The environmental issues identified are described in for the proposed are described in the Ferron EIS. A summary of the results of the scoping are maintained in the Price Field Office.

In addition, the Price Field Office issued a Notice of Intent (NOI) to revise the above land use plans in the Federal Register on November 7, 2001 initiating public scoping. This scoping included the No Action

Alternative, which represents current management, as outlined in the 1983 Price River MFP and the 1991 San Rafael RMP as altered through amendment and policy since adoption of the records of decision for those plans.

Item 7: No for the following parcels: None

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet. An Interdisciplinary checklist is attached to this DNA.

Name	Title	Resource Represented
Sue Burger	Physical Science Technician	Coal
Rebecca Doolittle	Geologist	Native American Consultation
Tom Gnojek	Outdoor Recreation Planner	Wilderness, Recreation
Brad Higdon	Environmental Coordinator	NEPA
Karl Ivory	Range Management Specialist	T&E Plants/Weeds
Mike Leschin	Geologist/Paleontology	Paleontology
Blaine Miller	Archaeologist	Cultural Resource
Mike Tweddell	Range Management Specialist	Wild Horses & Burros
David Waller	Wildlife Biologist	T&E Wildlife

F. Mitigation Measures: The following Lease Notices and/or Lease Stipulations should be applied to the identified, subsequent parcels (these are in addition to those applied by the Utah State Office). The asterisk after the parcel number indicates that a portion of the parcel has been deferred.

LEASE STIPULATIONS- WO-IM

1. Lease Stipulation-Cultural Resources (WO-IM-2005-003); This Stipulation Shall be Applied to All Parcels

"This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration, or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated." WO-IM 2005-03.

2. Lease Stipulation-Endangered Species Act Section 7 Consultation (WO-IM-2002-174): This Stipulation Shall be Applied to All Parcels.

*The lease area may now or hereafter contain plants, animals, or their habitats determined to be threatened, endangered, or other special status species. BLM may recommend modifications to exploration and development proposals to further its conservation and management objective to avoid BLM-approved activity that will contribute to a need to list such a species or their habitat. BLM may require modifications to or disapprove proposed activity that is likely to result in jeopardy to the continued existence of a proposed or listed threatened or endangered species or result in the destruction or adverse modification of a designated or proposed critical habitat. BLM will not approve any ground-disturbing activity that may affect any such species or critical habitat until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. §1531 *et seq.*, including completion of any required procedure for conference or consultation.*

LEASE STIPULATIONS	
UT-S-14 –High Country Watershed-should be added to the following parcels:	
UT0207-122*	UT0207-126
UT0207-124	
UT-S-114- Elk and Deer Winter Range –Should be added to the following parcels:	
UT0207-122*	
UT-S-124 -Greater Sage Grouse nesting habitat- Should be added to the following parcels:	
UT0207-122*	UT0207-125
UT0207-123	UT0207-126
UT0207-124	
UT-S-125-Raptor Nesting Surveys- Should be added to the following parcels:	
UT0207-125	
UT0207-126	
LEASE NOTICES (Parcels marked with * have been partially deferred.)	
UT-LN-07– Raptor Habitat- should be added to the following parcels:	
UT0207-125	
UT0207-126	
UT-LN-12- Crucial Elk Habitat – Should be added to the following parcels:	
UT0207-122	
UT-LN-21 High Potential Paleontological Resources-should be added to the following parcels:	
UT0207-123	UT0207-125
UT0207-124	UT0207-126
UT-LN-33– Raptor Surveys - Should be added to the following parcels:	
UT0207-125	
UT0207-126	
UT-LN-35 - Lease Notice – Paleontological should be added to the following parcels:	
UT0207-123	UT0207-125
UT0207-124	UT0207-126
UT-LN-51-Greater Sage Grouse Habitat - Should be added to the following parcels:	
UT0207-122*	UT0207-125
UT0207-123	UT0207-126
UT0207-124	
UT-LN-52-Migratory Birds - Should be added to the following parcels:	
UT0207-122*	UT0207-125
UT0207-123	UT0207-126
UT0207-124	
UT-LN- 56-Price Field Office- Should be added to the following parcels:	
UT0207-122*	UT0207-125
UT0207-123	UT0207-126
UT0207-124	
UT-LN-69- Riparian – Should be added to the following parcels:	
UT0207-122*	
UT0207-126	

CONCLUSIONS

Plan Conformance and Determination of NEPA Adequacy

Based on the review documented above, I conclude that the following parcels conform with the existing land use plans and have adequate NEPA (* indicates that a portion of this parcel is deferred):

UT0207-122*

UT0207-123

UT0207-124

UT0207-125

UT0207-126

Based on new information identified in the 2004 Draft RMP EIS, the current land management prescriptions under the Price River MFP and the San Rafael RMP no longer provide adequate protection of specific resource values located within the parcels listed below (refer to Attachment 3 deferred parcel table rationale).

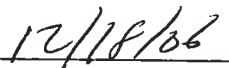
(* indicates that a portion of this parcel is recommended for lease)

UT0207-122*

UT0207-128



Signature of the Responsible Official



Date